

VIRGINIA AGPAC

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COMMISSION
REPORTS ANALYSIS
DIVISION

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POLITICAL December 15, 2010

Ms. Nicole Della Rocco Senior Campaign Financial Analyst Reports Analysis Division Federal Election Commission Washington, DC 20463

Identification Number: COO491175

Reference: Statement of Organization, received 11/3/10

Dear Ms. Della Rocco:

This letter is in response to your November 24, 2010 letter (attached) requiring additional information.

After further review of CFR §100.6, it appears our original Statement of Organization incorrectly identified "Virginia Farm Bureau Federation" as an "Affiliated Organization" when "Virginia Farm Bureau Federation" should have been identified as a "Connected Organization". While Virginia Farm Bureau Federation does not provide direct monitory support to Virginia AGPAC, they do provide Virginia AGPAC with access to Virginia Farm Bureau Federation staff and facilities at no charge to Virginia AGPAC. In parallel with this letter, we will amend our Statement of Organization filing to correctly identify Virginia Farm Bureau Federation as a "Connected Organization" on Line 6.

In addition, we will amend the name of the organization from "Virginia AGPAC" to "Virginia Farm Bureau Federation AGPAC" on the Statement of Organization in parallel with this letter.

I trust these explanations provide the clarifications to your questions. Should you need additional information or have further questions, please feel free to contact me at 804-290-1556 or <a href="mailto:day@vafb.com">david.priddy@vafb.com</a>.

David Priddy

Assistant Treasurer

Enclosures



## FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

November 24, 2010

David Priddy, Treasurer Virginia AGPAC P.O. Box 27552 Richmond, VA 23261-7552

Response Due Date: December 29, 2010

Identification Number: C00491175

Reference:

Statement of Organization, received 11/3/10

Dear Treasarer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. Failure to adequately respond by the response date noted above could result in an audit or enforcement action. Additional information is needed for the following item:

-Please elarify your relationship, if any, with "Virginia Farm Bureau Federation," which appears to be your connected organization. For further guidance on the question of connected organizations, please refer to 11 CFR §100.6. If "Virginia Farm Bureau Federation" is your connected organization, you should amend your Statement of Organization to check the "Connected Organization" box on Line 6.

Further, the entire name of your connected organization must be included in the name of your political committee. While committees may use commonly recognized abbreviations on daily communications such as letterhead and committee checks, committee filings (Statement of Organization, disclosure reports and amendments) must reflect the official name of the connected organization, as well as any abbreviation, within its title. 2 U.S.C. §432(e)(5) Please clarify this apparent discrepancy.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to

taking enforcement action. Requests for extensions of time in which to respond will not be considered.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1139.

Sincerely,

Nicole Della Rocco

Senior Campaign Finance Analyst

Nicole Pellaffoces

Reports Analysis Division

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